

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

DAWN HAMILTON,
Defendant.

No. 1:13cr75

18 U.S.C. § 1031 & 2

(Major Fraud against the United States)

Criminal Information

The United States charges that:

Count 1

(Major Fraud against the United States)

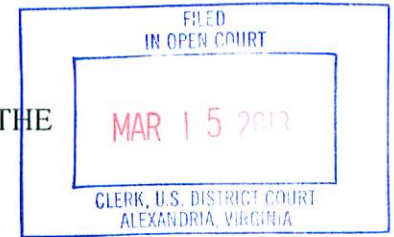
The Contract Award

1. In or about September 2006, the United States, in a procurement of services, awarded prime contract number HSCG23-08-D-MMZ339 ("Contract Z339") with the U.S. Coast Guard ("USCG") of the U.S. Department of Homeland Security ("DHS") to Company B, the value of said prime contract being \$48,522,390.08.

The Scheme and Artifice

2. Beginning in or about 2003 and continuing up to in or about February 2012, in connection with the foregoing and other procurements, the defendant, Dawn Hamilton, with others known and unknown, executed and caused to be executed a scheme and artifice to defraud the United States and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

3. It was part of the scheme and artifice to defraud the United States and to obtain money and property by means of false and fraudulent pretenses, representations, and promises,



that the defendant would and did: (i) falsely represent to the Small Business Administration (“SBA”) and multiple U.S. government agencies, including the USCG, that Company B was eligible for SBA-administered contracting preferences (including those provided under its “8(a) Business Development Program” for disadvantaged small business owners and those provided to small businesses more generally); (ii) falsely represent to the SBA that Company A, which was not eligible for the aforementioned SBA contracting preferences, did not exercise control over Company B; (iii) cause Company B to receive 8(a) and small business contract awards, including Contract Z339, to which Company B was not entitled; and (iv) misrepresenting to the National Aeronautics and Space Administration (“NASA”) that Company B was in compliance with SBA regulations pertaining to Company B’s NASA contracts, including that Company B employees had performed the required percentage of work on those contracts.

Execution of the Scheme and Artifice

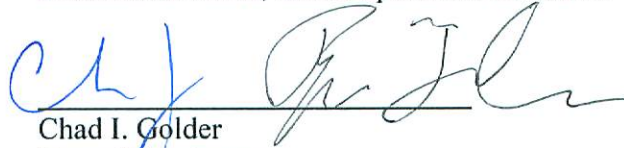
4. From in or about 2008 through in or about February 2012, within the Eastern District of Virginia and elsewhere, the defendant, Hamilton, knowingly executed the scheme and artifice in connection with Contract Z339 by intentionally creating and causing to be submitted to USCG fraudulent proposals and other required information in connection with Contract Z339, despite knowing that Company B was not eligible for that contract because Company A and its management created and exerted control over Company B to obtain, among other contracts, Contract Z339. As a result of these and other fraudulent actions, USCG paid Company B a total of \$18,108,805.00 on Contract Z339, none of which Company B was entitled to receive.

(All in violation of Title 18, United States Code, Sections 1031 and 2.)

Neil H. MacBride
United States Attorney

Jeffrey H. Knox
Chief, Fraud Section
Criminal Division, U.S. Department of Justice

By:



Chad I. Golder
Ryan S. Faulconer
Assistant U.S. Attorneys